1 2	LATHAM & WATKINS LLP Melanie M. Blunschi (Bar No. 234264) melanie.blunschi@lw.com	ELIZABETH K. MCCLOSKEY (SBN 268184) emccloskey@gibsondunn.com ABIGAIL A. BARRERA (SBN 301746)
3	Kristin Sheffield-Whitehead (Bar No. 304635)	abarrera@gibsondunn.com One Embarcadero Center, Suite 2600
4	kristin.whitehead@lw.com 505 Montgomery St., Suite 2000	San Francisco, CA 94111-3715 Telephone: +1.415.393.8200
5	San Francisco, CA 94111 Telephone: +1.415.391.0600	Facsimile: +1.415.393.8306
6	Andrew B. Clubok (pro hac vice)	
7	andrew.clubok@lw.com 555 Eleventh Street, NW, Suite 1000	
8	Washington, D.C. 20004 Telephone: +1.202.637.2200	
9	Michele D. Johnson (Bar No. 198298)	
10	michele.johnson@lw.com 650 Town Center Drive, 20th Floor	
11	Costa Mesa, CA 92626 Telephone: +1.714.540.1235	
12	Attorneys for Defendant Meta Platforms, Inc.	
13	(formerly known as Facebook, Inc.)	
14	[Additional Counsel Listed Below]	
	UNITED STATES DISTRICT COURT	
15	UNITED STATE	S DISTRICT COURT
15 16		S DISTRICT COURT RICT OF CALIFORNIA
	NORTHERN DISTI	
16	NORTHERN DISTI SAN FRANCE ERICA FRASCO, et al., individually and on	RICT OF CALIFORNIA
16 17	NORTHERN DISTI SAN FRANCE ERICA FRASCO, et al., individually and on behalf of all others similarly situated,	CISCO DIVISION  Case No. 3:21-CV-00757-JD  META PLATFORMS, INC.'S NOTICE OF
16 17 18	NORTHERN DISTI SAN FRANCE ERICA FRASCO, et al., individually and on behalf of all others similarly situated, Plaintiffs,	CISCO DIVISION  Case No. 3:21-CV-00757-JD
16 17 18 19	NORTHERN DISTI SAN FRANCE ERICA FRASCO, et al., individually and on behalf of all others similarly situated, Plaintiffs, V.	CISCO DIVISION  Case No. 3:21-CV-00757-JD  META PLATFORMS, INC.'S NOTICE OF WITHDRAWAL OF STATUTE OF
16 17 18 19 20	NORTHERN DISTICATION SAN FRANCE  ERICA FRASCO, et al., individually and on behalf of all others similarly situated,  Plaintiffs,  V.  FLO HEALTH, INC., et al.,	CISCO DIVISION  Case No. 3:21-CV-00757-JD  META PLATFORMS, INC.'S NOTICE OF WITHDRAWAL OF STATUTE OF
16 17 18 19 20 21	NORTHERN DISTI SAN FRANCE ERICA FRASCO, et al., individually and on behalf of all others similarly situated, Plaintiffs, V.	CISCO DIVISION  Case No. 3:21-CV-00757-JD  META PLATFORMS, INC.'S NOTICE OF WITHDRAWAL OF STATUTE OF
16 17 18 19 20 21 22	NORTHERN DISTICATION SAN FRANCE  ERICA FRASCO, et al., individually and on behalf of all others similarly situated,  Plaintiffs,  V.  FLO HEALTH, INC., et al.,	CISCO DIVISION  Case No. 3:21-CV-00757-JD  META PLATFORMS, INC.'S NOTICE OF WITHDRAWAL OF STATUTE OF
16 17 18 19 20 21 22 23	NORTHERN DISTICATION SAN FRANCE  ERICA FRASCO, et al., individually and on behalf of all others similarly situated,  Plaintiffs,  V.  FLO HEALTH, INC., et al.,	CISCO DIVISION  Case No. 3:21-CV-00757-JD  META PLATFORMS, INC.'S NOTICE OF WITHDRAWAL OF STATUTE OF
16 17 18 19 20 21 22 23 24	NORTHERN DISTICATION SAN FRANCE  ERICA FRASCO, et al., individually and on behalf of all others similarly situated,  Plaintiffs,  V.  FLO HEALTH, INC., et al.,	CISCO DIVISION  Case No. 3:21-CV-00757-JD  META PLATFORMS, INC.'S NOTICE OF WITHDRAWAL OF STATUTE OF
16 17 18 19 20 21 22 23 24 25	NORTHERN DISTICATION SAN FRANCE  ERICA FRASCO, et al., individually and on behalf of all others similarly situated,  Plaintiffs,  V.  FLO HEALTH, INC., et al.,	CISCO DIVISION  Case No. 3:21-CV-00757-JD  META PLATFORMS, INC.'S NOTICE OF WITHDRAWAL OF STATUTE OF
16 17 18 19 20 21 22 23 24 25 26	NORTHERN DISTICATION SAN FRANCE  ERICA FRASCO, et al., individually and on behalf of all others similarly situated,  Plaintiffs,  V.  FLO HEALTH, INC., et al.,	CISCO DIVISION  Case No. 3:21-CV-00757-JD  META PLATFORMS, INC.'S NOTICE OF WITHDRAWAL OF STATUTE OF

## NOTICE OF WITHDRAWAL OF STATUTE OF LIMITATIONS DEFENSE

Meta Platforms, Inc. ("Meta") hereby withdraws its statute of limitations defense. Accordingly, jury instructions Nos. 18 and 19 (*see* Dkt. 741 at 20-21) and question Nos. 1 and 2 on the verdict form (*see* Dkt. 742 at 2-3) should be omitted. Plaintiffs' counsel indicated that they do not oppose Meta's withdrawal of its statute of limitations defense and the deletion of the corresponding instructions and questions.

7

8

1

2

3

4

5

6

DATED: July 31, 2025

<u>/s/ Andrew B. Clubok</u>

9

10

11

12

13

14

15

16

17

18

1920

21

22

23

24

2526

27

28

LATHAM & WATKINS LLP
Melanie M. Blunschi (Bar No. 234264)

melanie.blunschi@lw.com
Kristin Sheffield-Whitehead (Bar No. 304635)

kristin.whitehead@lw.com
Nicholas Rosellini
nick.rosellini@lw.com (Bar No. 316080)
505 Montgomery St., Suite 2000
San Francisco, CA 94111
Telephone: +1.415.391.0600

Andrew B. Clubok (pro hac vice) andrew.clubok@lw.com 555 Eleventh Street, NW, Suite 1000 Washington, D.C. 20004 Telephone: +1.202.637.2200

Michele D. Johnson (Bar No. 198298) michele.johnson@lw.com 650 Town Center Drive, 20th Floor Costa Mesa, CA 92626 Telephone: +1.714.540.1235

Elizabeth K. McCloskey (SBN 268184) Abigail A. Barrera (SBN 301746) One Embarcadero Center, Suite 2600 San Francisco, CA 94111-3715 Telephone: +1.415.393.8200 emccloskey@gibsondunn.com abarrera@gibsondunn.com

Counsel for Defendant Meta Platforms, Inc. (formerly known as Facebook, Inc.)